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10 **DENNIS MONTALI**
11 U.S. Bankruptcy Judge

12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 In re:

16 **PG&E CORPORATION,**

17 - and -

18 **PACIFIC GAS AND ELECTRIC COMPANY,**

19 **Debtors.**

20 Case No. 19-30088 (DM)
21 Chapter 11
22 (Lead Case)
23 (Jointly Administered)

24 **ORDER APPROVING STIPULATION
25 MODIFYING PLAN INJUNCTION
26 (PETER A. LOPEZ AND MICHAEL
27 A. LOPEZ, JR.)**

- 28 Affects PG&E Corporation
29 Affects Pacific Gas and Electric Company
30 Affects both Debtors

* All papers shall be filed in the Lead Case,
No. 19-30088 (DM).

1 The Court having considered the *Stipulation Modifying Plan Injunction (Peter A. Lopez and*
2 *Michael A. Lopez, Jr.)*, dated October 13, 2021 [Dkt. No. 11412] (the “**Stipulation**”),¹ entered into
3 by PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
4 reorganized debtors (collectively, the “**Debtors**” and as reorganized pursuant to the Plan (as defined
5 below), the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on
6 the one hand, and Peter A. Lopez and Michael A. Lopez Jr. (collectively, “**Plaintiffs**,” and, together
7 with the Debtors and Reorganized Debtors, the “**Parties**”), on behalf of themselves and all others
8 similarly situated, on the other hand; and pursuant to such Stipulation and agreement of the Parties,
9 and good cause appearing,

10 IT IS HEREBY ORDERED THAT:

11 1. The Stipulation is approved.

12 2. Upon the date of the entry of this Order, the Plan Injunction shall be modified, to the
13 extent necessary, solely to permit the Parties to seek final approval of the Class Action Settlement
14 Agreement in the State Court Action and to take all actions necessary in connection with obtaining
15 such approval.

16 3. Upon the date of the entry of this Order, the Stipulation shall be deemed an
17 objection by the Reorganized Debtors to the Proof of Claim, and the Proof of Claim shall be
18 considered a Disputed Claim. The Proof of Claim shall be deemed an Allowed Claim,
19 recoverable solely as a Utility General Unsecured Claim in accordance with the Plan and through
20 the claims reconciliation process in these Chapter 11 Cases, on the earlier of the date on which an
21 order and judgment of the State Court approving the Class Action Settlement Agreement on a
22 final basis in the State Court become final and non-appealable or all appeals from such judgment
23 have been concluded.

24 4. Nothing in the Stipulation or this Order is intended, nor shall it be construed, to be:

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¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to
28 them in the Stipulation.

- 1 a. a waiver by the Reorganized Debtors or any other party in interest, of any
2 right to object to the Proof of Claim or any portion of the underlying claim in
3 the event the Class Action Settlement Agreement is not approved on a final
4 basis in the State Court Action, or
5 b. a waiver by Plaintiffs of their rights to oppose any asserted challenge to any
6 Proof of Claim, or
7 c. a waiver by any Party of any claim or defense in the State Court Action.

8 5. For purposes of conduct of the State Court Action, the Parties through their counsel
9 may enter into other stipulations in or with regard to the State Court Action, including without
10 limitation stipulations relating to discovery matters, motion practice, the form or presentation of
11 evidence, or the conduct of the trial. Such stipulations shall be enforceable by the State Court (not
12 the Bankruptcy Court) in accordance with statutes, rules and procedures applicable to the State Court
13 Action.

14 6. The Stipulation shall be binding on the Parties and each of their successors in interest.

15 7. The Stipulation shall constitute the entire agreement and understanding of the Parties
16 relating to the subject matter thereof and supersedes all prior agreements and understandings relating
17 to the subject matter thereof.

18 8. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
19 controversies arising from the Stipulation or this Order.

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21 APPROVED AS TO FORM AND CONTENT:

23 Dated: October 13, 2021

24 COHELAN KHOURY & SINGER

25 /s/ Isam C. Khoury
Isam C. Khoury

26 Attorneys for Peter A. Lopez and Michael A. Lopez Jr.